

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

ASSOCIATION OF AMERICAN  
UNIVERSITIES, *et al.*,

Plaintiffs,

v.

DEPARTMENT OF HEALTH & HUMAN  
SERVICES, *et al.*,

Defendants.

Case No. 1:25-cv-10346-AK

**MOTION FOR *PRO HAC VICE* ADMISSION OF ELIZABETH HENTHORNE**

Now comes Shoba Pillay, a member in good standing of the bar of this Court, and moves pursuant to Local Rule 83.5.3 for the admission in this case of Elizabeth Henthorne as counsel for Plaintiffs, Association of American Universities, American Council on Education, Association of Public and Land-grant Universities, Brandeis University, Brown University, the Regents of the University of California, the California Institute of Technology, Carnegie Mellon University, the University of Chicago, Cornell University, the George Washington University, Johns Hopkins University, Massachusetts Institute of Technology, Trustees of The University of Pennsylvania, University of Rochester, and Trustees of Tufts College.

Ms. Henthorne is a partner in the law firm of Jenner & Block LLP. She is a member of the bar in good standing in every jurisdiction in which she has been admitted to practice; there are no disciplinary proceedings pending against her as a member of the bar in any jurisdiction; she has not previously had a *pro hac vice* admission to this Court (or other admission for a limited purpose under Local Rule 83.5.3) revoked for misconduct; and she has read and agrees to comply with the Local Rules of the United States District Court for the District of Massachusetts.

**WHEREFORE**, Shoba Pillay requests that Ms. Henthorne be granted leave to appear and practice *pro hac vice* on behalf of the above-captioned matter.

Dated: February 11, 2025

Respectfully submitted,

ASSOCIATION OF AMERICAN UNIVERSITIES,  
AMERICAN COUNCIL ON EDUCATION,  
ASSOCIATION OF PUBLIC AND LAND-GRANT  
UNIVERSITIES, BRANDEIS UNIVERSITY, BROWN  
UNIVERSITY, THE REGENTS OF THE UNIVERSITY  
OF CALIFORNIA, THE CALIFORNIA INSTITUTE OF  
TECHNOLOGY, CARNEGIE MELLON UNIVERSITY,  
THE UNIVERSITY OF CHICAGO, CORNELL  
UNIVERSITY, THE GEORGE WASHINGTON  
UNIVERSITY, JOHNS HOPKINS UNIVERSITY,  
MASSACHUSETTS INSTITUTE OF TECHNOLOGY,  
TRUSTEES OF THE UNIVERSITY OF  
PENNSYLVANIA, UNIVERSITY OF ROCHESTER,  
and TRUSTEES OF TUFTS COLLEGE,

*/s/ Shoba Pillay*

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Shoba Pillay, BBO No. 659739  
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Chicago, IL 60654  
Tel: (312) 222-9350  
SPillay@jenner.com

**LOCAL RULE 7.1 CERTIFICATION**

As of the date of this filing, it is unknown who will represent the defendants in this matter. For that reason, counsel have not had an opportunity to confer in an effort to resolve or narrow the issues presented by this motion.

*/s/ Shoba Pillay*  
Shoba Pillay

**CERTIFICATE OF SERVICE**

I, Shoba Pillay, hereby certify that a true copy of this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on February 11, 2025.

*/s/ Shoba Pillay*  
Shoba Pillay

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**CERTIFICATION IN SUPPORT OF  
MOTION FOR *PRO HAC VICE* ADMISSION**

Pursuant to Local Rule 83.5.3(e)(3) of the Local Rules of the United States District Court for the District of Massachusetts, I, Elizabeth Henthorne, hereby certify:

1. I submit this certification in support of Plaintiffs' Motion for Pro Hac Admission.
2. I am a partner in the law firm of Jenner & Block LLP and a member of the bars of the District of Columbia and New York bars.
3. I am a member of the bar in good standing in every jurisdiction in which I have been admitted to practice.
4. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.
5. I have not previously had a *pro hac vice* admission to this Court (or other admission for a limited purpose under Local Rule 83.5.3) revoked for misconduct.

6. I have read and agree to comply with the Local Rules of the United States District Court for the District of Massachusetts.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 11, 2025

/s/ *Elizabeth Henthorne*  
Elizabeth Henthorne  
(D.C. Bar #1562688; NY Bar #5386149)  
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